

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TERRA TOWERS CORP., TBS  
MANAGEMENT, S.A., and DT HOLDINGS,  
INC.,

*Petitioners,*

v.

TELECOM BUSINESS SOLUTION, LLC,  
LATAM TOWERS, LLC, and AMLQ  
HOLDINGS (CAY) LTD.,

*Respondents.*

No. 22-cv-07301-LAK

Pursuant to 59(e) of the Federal Rules of Civil Procedure, Petitioners Terra Towers Corp., TBS Management, S.A. (together, “**Terra**”), and DT Holdings, Inc. (“**DTH**”), respectfully moves to **alter or amend** the judgment entered on February 21, 2024, denying Petitioners’ amended petition to disqualify the arbitral panel (DE 59), and for other and further relief as the Court deems just and proper. In support, Terra/DTH submits their Memorandum of Law dated March 19, 2024, and a Declaration in Support, which are being filed contemporaneously with this **motion**.

Dated: Miami, FL

March 19, 2024

Respectfully submitted,

**CAREY RODRIGUEZ LLP**

By: /s/ Juan J. Rodriguez  
Juan J. Rodriguez\*

1395 Brickell Avenue, Suite 700  
Miami, Florida 33131  
Phone: 305-372-7474  
Fax: 305-372-7475  
jrodriguez@careyrodriguez.com  
*\*Admitted Pro Hac Vice*

*Counsel for Petitioners*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed with the Clerk using appellate CM/ECF system on March 19, 2024. All counsel of record are registered CM/ECF users, and service will be accomplished by the CM/ECF system.

/s/ Juan J. Rodriguez  
Juan J. Rodriguez  
*Counsel for Petitioners*